

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,)	Civil Action No. 04-264 ERIE
)	Judge Sean J. McLaughlin
Plaintiff)	
)	
)	ELECTRONICALLY FILED
)	
CRAWFORD CENTRAL SCHOOL)	
DISTRICT, et al.)	
Defendants)	

**JOINT MOTION TO EXTEND TIME FOR FILING
FINDINGS OF FACT & CONCLUSIONS OF LAW**

AND NOW, this 12th day of September, 2007, Defendant, Crawford Central School District¹, by and through its attorneys, Knox McLaughlin Gornall & Sennett, P.C., and Plaintiff, Rowena Wagner, by and through her attorney, John J. Mead, Esq., move to extend the time for filing their findings of fact and conclusions of law. In support thereof, the parties state the following:

1. A bench trial in this case was held June 18 through 21, 2007.
2. On June 22, 2007, the Court ordered the parties to file their findings of fact and conclusions of law within twenty days of their receipt of the trial transcript.
3. The parties received copies of the trial transcript on August 14, 2007, making their findings of fact and conclusions of law due on or before September 4, 2007.
4. On August 23, 2007, the parties requested an extension for filing their Findings of Fact and Conclusions of Law to August 24, 2007.

¹ During the October 27, 2006 hearing on Defendants' Motion for Summary Judgment, the Court dismissed Crawford Central School Board, Superintendent Michael E. Dolecki and Assistant Superintendent Charles E. Heller, III as defendants.

5. By Order dated August 23, 2007, the Court granted the parties' request for an extension of time in which to file their Findings of Fact and Conclusions of Law.

6. Due to several professional conflicts, the parties respectfully request that the Court extend the time for filing their findings of fact and conclusions of law by twenty days, to October 15, 2007.

7. This is the parties' second request.

WHEREFORE, Defendant, Crawford Central School District, and Plaintiff, Rowena Wagner, respectfully request that the Court grant their Joint Motion to Extend the Time for Filing Findings of Fact and Conclusions of Law to October 15, 2007.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

Respectfully submitted,

SCARPITTI & MEAD, LLP

BY: /s/ Mark J. Kuhar
Mark J. Kuhar, Esq.
120 West Tenth Street
Erie, Pennsylvania 16501-1461
Phone: (814) 459-2800
Fax: (814) 453-4530
E-mail: mkuhar@kmgslaw.com
PA Bar No.: 71185

Attorneys for Defendant,
Crawford Central School District

BY: /s/ John J. Mead
John J. Mead, Esq.
1001 State Street, Suite 800
Erie, PA 16501
Phone: (814) 459-1726
Fax: (814) 454-3585
E-mail: jmead85@aol.com
PA Bar No.: 39610

Attorney for Plaintiff,
Rowena Wagner

744274